

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Creosote DeRidder - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Progress - Removal Action
American Creosote DeRidder
A6KM
DeRidder, LA
Latitude: 30.8317038 Longitude: -93.2768610

To: Jeff Dauzat, LDEQ
Reggie Cheatham, EPA HQ
Craig Carroll, EPA Region 6

From: Adam Adams, OSC

Date: 9/10/2020

Reporting Period: April 2020 to September 4th 2020

1. Introduction

1.1 Background

Site Number:	A6KM	Contract Number:	
D.O. Number:		Action Memo Date:	12/18/2019
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	3/3/2020	Start Date:	3/4/2020
Demob Date:		Completion Date:	
CERCLIS ID:	LAN000604293	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA incident category: Inactive Production Facility – Creosote Wood Treater
This is an EPA lead Time-Critical Removal Action.

1.1.2 Site Description

American Creosote Deridder (Site) consists of a 55-acre tract of land owned by Central Manufacturing Co. (CMC) and the location of an inactive facility that produced creosote-treated wood. The Site has been inactive for 60+ years and currently covered by a mixture of heavy timber and extensive overgrowth.

The Shreveport Creosoting Company operated the facility from early 1920's until approximately 1957, used creosote oil and oil tar in their treatment process, and abandoned the facility after 25+ years of operations. The abandoned facility is located in the central west portion of the Site and contains remnants of the former facility along with process related waste. Site drainage from the abandoned facility primarily flows overland southwest, along western property boundary, into an unnamed drainage ditch/stream, which is a segment of contiguous wetland, then flows west through a culvert and under an old Burlington Northern Santa Fe (BNSF) Railway spur where it continues to flow southwest into a fresh water pond.

1.1.2.1 Location

The Site is located off of Post Plant Road, south of the corporate limits of the City of DeRidder, Beauregard Parish, LA; at 30.831693°, -93.276863°; in Section 3, Township 3 South, and Range 9 West; and within a mixed use area, residential and industrial. The Site is bounded in the north by a rural roadway, in the east by heavy brush, in the south by undeveloped land, and in the west by the old BNSF spur. The Site is accessible from the north at the intersection of Post Plant Rd. and the old BNSF spur and from the south at the intersection of Crosby Rd. and the old BNSF spur. An estimated 1,491 people live within a 1-mile radius of the Site, and the nearest residence is located approximately 0.3 miles to the east then residential communities approximately 0.5 miles to the east and north.

1.1.2.2 Description of Threat

The Site was finalized on the NPL on January 2018, and scored based on 5 Source Areas (SAs) and an observed release of hazardous substances to the surface water pathway. EPA identified numerous hazardous substances, primarily PAHs, within and around the 5 SAs, drainage pathway, and groundwater; TPH and metals were also identified. The 5 SAs include: 1) Concrete Structure of a Former Retort House, 2) Concrete Oil/Water Separator, 3) Unlined Wastewater Pit (AKA pond), 4) Aggregated Areas of Contaminated Soil, and 5) Stockpile of Creosote Solids.

In August 2018, EPA Remedial began a Remedial Investigation/Feasibility Study (RI/FS). In 2019, EPA Remedial Program requested assistance from the EPA Removal Program to address source material at the Site to prevent further offsite migration and reduce the threat to public health and environment while long-term remedial actions were determined. EPA Remedial identified 3 SAs (SAs 1, 2, and 3) as the primary concern that contain creosote solids and impacted soil, sediment, and/or surface/storm water containing PAHs and/or metal concentrations above RMLs. The highest concentrations were 4,314 ppm of

benzo(a)pyrene (BAP) Equivalent and 25.3 ppm of thallium within SA 3 sediment as compared to the industrial setting RMLs of 210 ppm and 12 ppm, respectively.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November 2019, EPA and the EPA Superfund Technical Assistance Response Team (START) contractor conducted a preliminary removal assessment. The Site was found to contain approximately 2,254 cubic yards of solid waste and approximately 204,974 gallons of liquid waste within and around SAs 1, 2, and 3, as applicable; identified BAP and naphthalene as main safety concerns; determined dioxins/furans were not present; selected approximate location of the 2,400-foot access pathway to SAs; and estimated 3 acres of vegetation clearing for pathway and work zones (estimates only).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During this reporting period, onsite removal action activities remained suspended in response to guidance and concerns related to the COVID-19 pandemic; however, EPA continued to coordinate and remained in contact with EPA Remedial and state and local governments for site status. Also during this time, EPA Remedial continued their RI/FS and completed installation of perimeter fencing in July 2020.

On August 24th 2020, EPA conducted a pre-storm site visit prior to landfall of Hurricane Laura that was anticipated to impact the site area. During the site visit, no signs of trespassing or vandalism were observed; the perimeter fencing was intact and undamaged; soil/solid waste stockpile within SA1 was found essentially secure, but the poly-sheeting covering had begun deteriorating; ACM waste stockpile also within SA1 was found unsecured due to the complete deterioration of poly-sheeting covering; non-woody vegetation has grown in previously cleared areas in and around SAs 1, 2, and 3; liquid levels of SA1 pit and SA2 appeared to be the same as in March 2020; SA3 liquid level was approximately 6-8" below top of bank, at southwest corner and overgrown with vegetation; SA4 and SA5 condition appeared to be in same condition as in March 2020; the access pathway was intact and accessible with no significant erosion or damage; the office trailer was also intact without signs of damage or vandalism; and the EPA-owned ATV stored at DeRidder Fire Department Training Facility were found in good condition. Prior to departure, the ACM waste stockpile was secured/covered with new poly-sheeting.

On August 28, 2020, EPA conducted a post-storm site visit following the August 27, 2020 landfall of Hurricane Laura as a Category 4 hurricane, which caused widespread damage to southwestern Louisiana parishes including Beauregard Parish before transitioning into Arkansas and downgrading to a Tropical Storm. During the site visit, the site access pathway was found impassable due to fallen trees; the off-site portion of the access pathway was partially washed-out; the perimeter fencing was damaged by fallen trees (only the west side was inspected, but expect additional damage on the other sides); soil/solid waste stockpile within SA1 was no longer covered with poly-sheeting; ACM waste stockpile remained covered/secured; SA1 was not damaged or covered by fallen trees; liquid levels were higher in SA1 pit and SA2; SA3 liquid level did not significantly increase; SA3, 4, and 5 were partially covered by fallen trees; and the office trailer was intact with no obvious signs of damage. In addition, the town of DeRidder sustained significant damage and was without power.

On September 4, 2020, EPA returned to the site to secure the soil/solid waste stockpile within SA1. The waste stockpile was covered/secured with new poly-sheeting. During this time, the site appeared to be in same condition as it was on August 28, 2020.

Currently, onsite removal action activities remain suspended due to the COVID-19 pandemic. EPA anticipates resuming the removal action in October 2020 once the COVID-19 pandemic reaches a manageable level and following CDC and national guidance; however, damage to Beauregard Parish and the town of DeRidder caused by Hurricane Laura may postpone the restart.

2.1.2 Response Actions to Date

Following assessment of Site conditions at the Site by the EPA Removal Program, an Action Memorandum for the Removal Action was approved and signed on December 18, 2019.

On March 3, 2020, EPA along with START and ERRS mobilized to implement the removal action.

On March 9, 2020, OSC Adams attended a community meeting with Deridder City Council to inform them of on-going and planned Removal Action operations. Following the meeting, Deridder law enforcement, emergency, public works, and other local government officials conducted several Site visits for a briefing and opportunity for questions and answers.

On March 19, 2020, EPA collected a representative sample of SA 3 sediment for waste characterization.

During week ending March 21, 2020, EPA began consolidation of SA 1 waste within SA 1 in preparation for transportation and disposal off-site.

On March 24, 2020, EPA completed establishing an access/egress pathway to the exclusion zone; approximately 1,800 feet long with geo-fabric, approximately 2,000 tons of rock, and approximately 900 tons of road base/fines to complete.

On March 27, 2020, the removal action was temporally suspended in response to guidance and concerns related to the COVID-19 pandemic. Removal personnel and equipment, except for the office trailer, were demobilized from the Site.

On August 24, 2020, EPA conducted a pre-storm site visit prior to landfall of Hurricane Laura. Site conditions were noted and the ACM waste stockpile was covered/secured.

On August 28, 2020, EPA conducted a post-storm site visit following the August 27th landfall of Hurricane Laura. The Site was impacted by the storm, which included removal of the poly-sheeting from the soil/solid waste stockpile within SA1; damage to perimeter fencing by fallen trees; and made access pathway unpassable due to fallen trees.

On September 4, 2020, EPA returned to the Site to secure the soil/solid waste stockpile within SA1. The stockpile was covered/secured with new poly-sheeting.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Potentially Responsible Party (PRP) is Central Manufacturing Company (CMC).

2.1.4 Progress Metrics

No wastes have been transported for disposal, as of the date of this POLREP.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Removal of wastes from the SAs and vicinity will be conducted by EPA. EPA will transport and dispose of the wastes off-site at acceptable disposal facilities. EPA will continue to coordinate the Removal Action with state and local governments, and communicate the status of the operations with the EPA RPM, property owner, and the community.

2.2.1.1 Planned Response Activities

EPA is prepared to mobilize back to the Site and resume the removal action following lifting of the temporary stand-down.

2.2.1.2 Next Steps

- Evaluate waste disposal options.
- Coordinate return with EPA contractors, state and local government, and continue communications with the EPA RPM, property owner, and community.

2.2.2 Issues

The Removal Action remained temporarily stood down due to the COVID-19 pandemic. The Site was impacted by Hurricane Laura on August 27th 2020, however, the waste material appeared to not have been significantly impacted. The temporary stand down and damage caused by Hurricane Laura may result in additional costs and time to complete the removal action.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No financials are provided in this POLREP, at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

EPA is coordinating this removal action with the EPA Remedial Program, LDEQ, Louisiana Department of Health and Hospital (LDHH), and City of DeRidder.

4. Personnel On Site

EPA START Contractors – 1 (2 at times, as needed) during pre- and post-storm site visits and none during remainder of reporting period other than EPA Remedial Team whose information is not included in this POLREP.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information may be obtained at response.epa.gov/AC-DeRidder.

6.2 Reporting Schedule

This is a Progress POLREP for this Removal Action. Additional POLREPs may be provided at the following frequency:

Progress POLREP - As progress continues over an extended period of time, a Progress POLREP may be submitted.

Special POLREP - In the event a significant situation occurs during the response, a Special POLREP may be submitted.

Final POLREP - Upon completion of this response, a Final POLREP shall be submitted.

POLREPs for Removal Assessment efforts will be submitted separately from the Removal Action POLREPs.

7. Situational Reference Materials

No information available at this time.